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7

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,
11 Plaintiff,
12
13 v.
14 JONATHAN OSHA BELL,
15 Defendant.

Case No. 2:03-cr-278-LDG-PAL-1

**STIPULATION TO CONTINUE
REVOCATION HEARING**
(Third Request)

16 IT IS HEREBY STIPULATED AND AGREED, by and between Steven W. Myhre,
17 Acting United States Attorney, and Alexandra Michael, Assistant United States Attorney,
18 counsel for the United States of America, and Rene L. Valladares, Federal Public Defender,
19 and Paul Riddle Assistant Federal Public Defender, counsel for Jonathan Osha Bell that the
20 Revocation Hearing currently scheduled on Monday, November 6, 2017 at 9:00 a.m., be
21 vacated and continued to a date and time convenient to the Court, but no earlier than ninety (90)
22 days.

23 This Stipulation is entered into for the following reasons:

24 1. Since the filing of the previous stipulation, undersigned defense counsel has
25 been informed that the underlying criminal allegation remains pending in a state court
26 proceeding which is not expected to resolve before the middle of January.

1 2. Since the state proceeding is inexorably linked to the allegations contained in
2 the petition, the parties agree to the need for continuance.

3 3. Defendant is not incarcerated and does not object to a continuance.

4 4. Additionally, denial of this request for continuance could result in a
5 miscarriage of justice.

6 This is the fourth request for continuance filed herein.

7 DATED this 3rd day of November, 2017.

8
9 RENE L. VALLADARES
10 Federal Public Defender

 STEVEN W. MYHRE
 Acting United States Attorney

11 /s/ Paul Riddle
12 By _____

13 PAUL RIDDLE
14 Assistant Federal Public Defender

 /s/ Alexandra Michael
 By _____

 ALEXANDRA MICHAEL
 Assistant United States Attorney

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 JONATHAN OSHA BELL,

7 Defendant.

Case No. 2:03-cr-278-LDG-PAL-1

8 **ORDER**

9
10 Based on the Stipulation of counsel and good cause appearing,

11 IT IS THEREFORE ORDERED that the Revocation Hearing currently scheduled on
12 Monday, November 6, 2017 at 9:00 a.m., be vacated and continued to February 26, 2018
13 at the hour of 9:00 a.m.

14 DATED this 3rd day of November, 2017.

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16 
17 UNITED STATES DISTRICT JUDGE